

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF ASSURED GUARANTY  
CORP. AND ASSURED GUARANTY MUNICIPAL CORP.  
REGARDING AUGUST 8, 2022, PRETRIAL CONFERENCE ON  
CONFIRMATION OF HTA PLAN OF ADJUSTMENT**

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, the “Assured Entities”) hereby submit this Informative Motion in compliance with the *Order Regarding Procedures for August 8, 2022 Pretrial Conference* (the “Pretrial Conference Procedures Order,” ECF No. 21493)<sup>2</sup> and respectfully state as follows:

---

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted. Capitalized terms used in this motion but not defined herein shall have the meanings ascribed to them in the Pretrial Conference Procedures Order.

1. William J. Natbony (bill.natbony@cwt.com), Casey J. Servais (casey.servais@cwt.com), and/or Mark C. Ellenberg (mark.ellenberg@cwt.com) of Cadwalader, Wickersham & Taft LLP will appear and reserve the right to be heard on behalf of the Assured Entities at the Pretrial Conference on August 8, 2022.

2. If necessary, Mr. Servais, Mr. Natbony, and/or Mr. Ellenberg may present oral argument on behalf of the Assured Entities related to the *Objection of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Motion of the HTA Insured Bondholder Group Submitting Exhibit List in Connection with Confirmation of HTA Plan of Adjustment* (ECF No. 21688 in Case No. 17-BK-3283-LTS and ECF No. 1330 in Case No. 17-BK3567-LTS).

3. Mr. Servais, Mr. Natbony and/or Mr. Ellenberg reserve the right to be heard on any matter raised by any party at the August 8, 2022, Pretrial Conference as concerns the Assured Entities related to the Title III Cases or the interests of the Assured Entities. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

*[Remainder of Page Intentionally Omitted]*

Dated: August 2, 2022  
New York, New York

**CASELLAS ALCOVER & BURGOS P.S.C.**

By: /s/ Heriberto Burgos Pérez

Heriberto Burgos Pérez  
USDC-PR No. 204,809  
Ricardo F. Casellas-Sánchez  
USDC-PR No. 203,114  
Diana Pérez-Seda  
USDC-PR No. 232,014  
P.O. Box 364924  
San Juan, PR 00936-4924  
Tel.: (787) 756-1400  
Fax: (787) 756-1401  
E-mail: hburgos@cabprlaw.com  
rcasellas@cabprlaw.com  
dperez@cabprlaw.com

*Counsel for Assured Guaranty Corp. and Assured  
Guaranty Municipal Corp.*

**CADWALADER, WICKERSHAM &  
TAFT LLP**

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.\*  
Mark C. Ellenberg\*  
Casey J. Servais\*  
William J. Natbony\*  
Thomas J. Curtin\*  
200 Liberty Street  
New York, New York 10281  
Tel.: (212) 504-6000  
Fax: (212) 406-6666  
Email: howard.hawkins@cwt.com  
mark.ellenberg@cwt.com  
casey.servais@cwt.com  
bill.natbony@cwt.com  
thomas.curtin@cwt.com

\* Admitted pro hac vice

*Counsel for Assured Guaranty Corp. and  
Assured Guaranty Municipal Corp.*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 2<sup>nd</sup> day of August, 2022.

By: /s/ Howard R. Hawkins, Jr.  
Howard R. Hawkins, Jr.\*  
\* Admitted pro hac vice